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March 5, 2024

Via ECF

United States District Court for the
Southern District of New York
40 Foley Square,
New York, New York 10007
Attn: Hon. Valerie E. Caproni

Re: *Henri v. Thelus et al*
 Case No. 1:24-cv-00329-VEC

Dear Judge Caproni,

This firm has recently been engaged to act as counsel for Defendants Theriel Thelus and Senet D. Achill. We submit this letter motion pursuant to 2(E) of the Court's Individual Practice Rules to request an extension in the time to respond to Plaintiff's Complaint.

Based on the allegations contained in the complaint, we intend to file a pre-answer motion to dismiss pursuant to 12(b)(6). It is my understanding that the Initial Pretrial Conference is scheduled for April 5, 2024 and we request the ability to set a motion schedule at the conference. Additionally, we request additional time to familiarize ourselves with the file and to obtain certified translations of the relevant documents.

The original deadline to respond was March 8, 2024. Defendants have made no previous requests for extensions of time. We have contacted Mr. Altman's office for his consent but have not heard back.

Respectfully submitted,

/s/ *Daniel S. Szalkiewicz*
By: Daniel S. Szalkiewicz, Esq.